



ROBINSON
GRAY

Litigation + Business

SAMUEL J. WELLBORN

DIRECT 803 231.7829 DIRECT FAX 803 231.7878

swellborn@robinsongray.com

May 3, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk / Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Public Service Commission Review of South Carolina Code of Regulations
Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J)

Docket No. 2020-247-A

**LETTER FROM BLUE GRANITE WATER COMPANY REGARDING WATER
AND SEWER REGULATION REVIEW – S.C. Code Ann. Regs. 103-735.1 and
103-535.1**

Dear Ms. Boyd:

I am filing this letter on behalf of Blue Granite Water Company (“Blue Granite” or the “Company”) as related to S.C. Code Ann. Regs. 103-535.1 and 103-735.1. Myself or Frank Ellerbe will appear on behalf of the Company at the May 12, 2021 workshop. Blue Granite previously submitted comments in the current Docket related to rate applications per S.C. Code Ann. Regs. 103-512.4 and 712.4 and has no further comments at this time on these Regulations.

Summary of Prior Comments in Docket No. 2020-247-A

There appears to be agreement between Blue Granite, the S.C. Office of Regulatory Staff (“ORS”), and Southwest Water Company (“SouthWest Water”) that the current requirement of certified mail notices per S.C. Code Ann. Regs. 103-535.1 should be modified to require only regular mail noticing.¹ As noted in previous filings in this docket, the certified mail requirement current process is ineffective, inefficient, and costly, and the cost of such mailings is the source of customer complaints.

¹ See ORS Letter, Docket No. 2020-247-A (Mar. 17, 2021); SouthWest Water Company Letter, Docket No. 2020-247-A (Mar. 9, 2021).



SouthWest Water also recommended modifying S.C. Code Ann. Regs. 103-735.1 to conform to the notice requirements of S.C. Code Ann. Regs. 103-535.1, narrowing the window between notice by regular mail and disconnection to 10 days. ORS instead proposed an additional communication to occur within 2-3 days of the disconnection. Blue Granite responded by supporting SouthWest Water's proposal of shortening the noticing window, while recommending a required door hanger to be used as the final notice before disconnection, as opposed to an additional notice via regular mail.

Additional Comments

When a Blue Granite customer account becomes past due, the noticing process is triggered and any notices that are generated and mailed pursuant to the Commission's regulations are also sent to the customer via the Billing module in MyUtilityConnect ("MUC"), the Company's mobile app. The MUC Billing module is updated for and logs all notices, whether certified or regular mail, and in cases where the customer has chosen the Paperless Billing option. Paperless Billing customers still receive certified or regular mail disconnection notices in addition to the notice being available through MUC. However, the customer must be registered on the app and must opt in to billing notifications to receive alerts for any notices. Currently, approximately 15,364 of Blue Granite's 22,173 customer accounts are registered users of MUC.

Blue Granite believes that door hangers are an effective method of communicating to customers. The Company has found that such direct communication, while difficult to carry out on as broad a scale as mailed notices, can present customers with an atypical method of communication that is more likely to catch their attention. The Company uses door hangers for multiple purposes, such as for final reads/meter lockouts, high bill checks, re-reads, leak detection, and when consumption is identified on inactive premises. The Company generally does not utilize door hangers as a pre-disconnection notice method, instead applying hangers after water has been shut off. Additionally, the multiple required mailed notices and inability to readily shut off sewer-only customers where no elder valve is in place can complicate any evaluation of door hanger efficacy. The unique circumstances surrounding COVID-19 have also forced utilities to alter their normal processes. Should door hangers become a standard practice for notice of eminent disconnection, especially in place of mailings that are spaced weeks apart, it seems likely to the Company that collections on past due accounts, and establishment of payment arrangements, will improve.



ROBINSON
GRAY

Litigation + Business

Thank you for your consideration of these comments. A copy of this filing is also being provided to the Office of Regulatory Staff.

Kind regards,

Sam Wellborn

SJW:tch

cc: Parties of Record (via email)
Donald Denton, President (via email)
Phil Drennan, Regional Director of FP&A (via email)

May 3, 2021
Page: 3